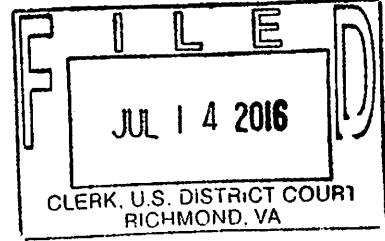


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

GARY McCRAY,



Plaintiff,

v.

Civil Action No.: 3:16 CV 588
Richmond Circuit Court Case No. CL16-2536

BARRY L. NEELY

and

MILAN SUPPLY CHAIN SOLUTIONS, INC.,

Defendants.

JOINT NOTICE OF REMOVAL

Defendants Barry L. Neely (“Neely”) and Milan Supply Chain Solutions, Inc. (“Milan”) (together, “Defendants”), by counsel and pursuant to 28 U.S.C. §§ 1441, file this Joint Notice of Removal to remove this action to this Court from the Circuit Court for the City of Richmond, Virginia. In support of this Joint Notice, Defendants state the following:

1. Upon information and belief, Plaintiff Gary McCray is, and was at all times relevant hereto, a resident, citizen, and domiciliary of the State of Connecticut.
2. Upon information and belief, at the time this action commenced, and at the time of removal, Neely was a resident, citizen, and domiciliary of the State of Tennessee.
3. At the time this action commenced, and at the time of removal, Milan was organized under the laws of the State of Tennessee and had its principle place of business in the State of Tennessee.

4. The Plaintiff has filed a Complaint against the Defendants in the Circuit Court for the City of Richmond, Virginia. A copy of the Plaintiff's Complaint and Defendants' Answer and Objection to Venue and Motion to Transfer are attached collectively hereto as **Exhibit A**, pursuant to 28 U.S.C. § 1446.

5. This Joint Notice is filed within thirty (30) days after service of the Plaintiff's Complaint upon the Defendants and is filed not more than one (1) year after the commencement of this action, pursuant to 28 U.S.C. § 1446(b).

6. This civil action is one over which this Court has original jurisdiction pursuant to 28 U.S.C. § 1332, and the amount in controversy alleged in the Complaint exceeds Seventy-Five Thousand Dollars (\$75,000.00) exclusive of interests and costs, and the action is between citizens of different states.

7. Defendants have given notice of the filing of the Joint Notice of Removal to counsel for the Plaintiff and have caused a copy to be filed with the Clerk of the Circuit Court for the City of Richmond, Virginia.

8. The Court embraces the place where the state court action is pending.

9. The Defendants are represented by the same counsel and all join in the removal of this case to the Court.

WHEREFORE, the Defendants, by counsel, hereby give notice to this Court that this action is removed to this Court from the Circuit Court for the City of Richmond, Virginia.

DATED: July 14, 2016

BARRY L. NEELY and
MILAN SUPPLY CHAIN SOLUTIONS,
INC.


Matthew D. Green (VSB No. 46913)
Gibson S. Wright (VSB No. 84632)
Attorneys for Neely and Milan
Morris & Morris, P.C.
11 South 12th Street
P.O. Box 30
Richmond, VA 23218-0030
(804) 344-8300 Telephone
(804) 344-8359 Facsimile
mgreen@morrismorris.com
gwright@morrismorris.com

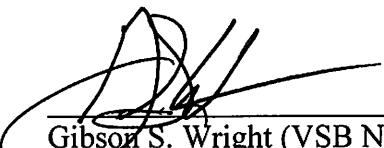
CERTIFICATE

I hereby certify that on July 14, 2016, I caused a true copy of the foregoing to be sent via
U.S. mail and facsimile to

Francis P. Hajek, Esquire
Wilson & Hajek, LLC
P.O. Box 206
Ivy, VA 22945
Facsimile: (434) 984-0881

and by mail to

Edward F. Jewett, Clerk
Richmond Circuit Court
400 North 9th Street
Richmond, VA 23219


Gibson S. Wright (VSB No. 84632)
Attorney for Neely and Milan
Morris & Morris, P.C.
11 South 12th Street
P.O. Box 30
Richmond, VA 23218-0030
(804) 344-8300 Telephone
(804) 344-8359 Facsimile
gwright@morrismorris.com